

EXHIBIT 25

From: Toan Do </O=PUBLIX/OU=NAMERICA/CN=RECIPIENTS/CN=XTLD2>
To: Jillanne Smith; William Hammond; Adam Maingot
Sent: 7/25/2018 3:37:15 PM
Subject: CS Threshold Training for Pharmacy Supervisors (4).docx
Attachments: CS Threshold Training for Pharmacy Supervisors (4).docx

Here is the document that addresses threshold training to the Supervisors. This was discussed in June.

Thank you,
Toan

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PLAINTIFF TRIAL
EXHIBIT
P-01371

Controlled Substance Threshold Training for Pharmacy Supervisors

Background

This is training for supervisors to help them understand their roles and responsibilities as they relate to Controlled Substance Ordering and Increase of Thresholds. Publix establishes controlled substance thresholds by store to ensure we are in compliance with DEA regulations, and to prevent potential diversion from suspicious ordering. New stores are set corporately with initial thresholds based on the selected model store. No action is required by the Supervisor and/or Pharmacy team for this step.

Importance

Supervisors need to understand that they are held equally responsible as the Pharmacist for diversion if it occurs at a store where they have approved threshold increases without conducting proper due diligence to ensure the pharmacy's compliance with DEA rules and regulations.

The Process

Stores will periodically receive threshold rejections for controls shipping from the warehouse and ABC, but the notifications will come in different formats. Please refer to the 4/18/2018 Weekly Memo for more details regarding notification of the threshold rejection.

Once a store is notified of the rejection, the pharmacist should be the first to investigate the change in business (new patient, surrounding store closure, opening of a new Healthcare Practitioner (HCP) practice, etc). If they believe the increase to be reasonable and justifies a request for increase, a Controlled Substance Threshold Change Request should be submitted via the Publix Connection. (Path: Publix Connection → Pharmacy Operations → Ordering and Receiving Product → Controlled Substance Threshold Change Request).

This request will generate an automated email to the pharmacy, supervisor and Megan McAvoy, Manager of Procurement, Generic Trade. It is imperative that all supervisors understand that **no action is taken to increase this request until a supervisor also evaluates the business justification and provides written approval** to Megan McAvoy and the Pharmacy Operations Manager with the following *suggested* documentation:

- (From the Performance Report in doc direct) Avg Rx/Wk % Chg YTD
- (From the CII Monthly Pull Report): Is the pharmacy highlighted in any category or in CII Rx%? If yes, please provide detail.

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TIME

Controlled Substance Threshold Training for Pharmacy Supervisors 1

Controlled Substance Threshold Training for Pharmacy Supervisors, Continued

Best Practices

Below is a recap of best practices for reviewing and approving threshold increase requests:

- Please keep in mind, thresholds are based on a 30 day rolling period, not a calendar month
- Review the **product in question** and the **“why”** in the pharmacy explanation in the request
 - Does anything stand out? Is reason vague? If necessary, follow up with Pharmacist for more info.
 - Don't be afraid to ask questions and require more detailed justification
- Evaluate the **requesting pharmacist**
 - Have they properly vetted incoming Rx?
 - Are they comfortable “saying no” to patients when required?
- Review **Store Growth**
 - Review the Pharmacy Performance Report
 - Rx Count Trending
 - Increasing thresholds where Rx count growth is flat or declining should be a red flag
 - Does increase amount match store growth rate?
 - Has there been a change in overall store environment?
 - New HCP practice open?
 - Competitor closing?
 - File Buys?
- Review the monthly **CII Pull Report**
 - Pull up this store only and look for the following:
 - Is column H highlighted red? These are the top 25 stores with highest CII Rx %
 - Is the Store number in Column A highlighted yellow? Those have high dispense % in multiple categories
 - Remaining highlighted Stores in Column A are high in specific drug categories and require additional investigation

Questions

Please always first contact your POM if you have questions before sending an approval of which you are unsure.